



VIA ELECTRONIC FILING

February 20, 2023

Honorable Rosemary Gambardella
United States Bankruptcy Court
District of New Jersey
50 Walnut Street
3rd Floor
Newark, New Jersey 07102

RE: *Jacobs v. Nationstar, et al*
Adversarial Proceeding No.: 16-01528-RG

Your Honor:

My office represents non-party BSI Financial Services (“BSI”), the successor loan servicer to defendant Nationstar Mortgage, LLC. We write in response to the letter submitted by attorney John Fazzio, III, Esq. on January 13, 2023, regarding debtor Randall Jacobs’ (“Debtor”) purported intention to negotiate a loan modification with BSI.

In his Letter, Mr. Fazzio claims that his client needed additional time to negotiate a loan modification as Debtor purports to require certain documentation from BSI. Please note that last month BSI rejected Debtor’s modification application due to the Debtor’s failure to required trial plan payments. There is thus nothing to negotiate.

Further, as the Court is aware, the parties engaged in mediation multiple times, during which, my office repeatedly provided Debtor with all relevant documentation concerning the subject mortgage loan. The relevant documentation was, in fact, provided years before Mr. Fazzio became involved in the case and again to Mr. Fazzio.

Please feel free to reach out to me should you have any questions or concerns.

FRIEDMAN VARTOLO LLP
/s Michael Eskenazi
Michael E. Eskenazi, Esq.